

WILLKIE FARR & GALLAGHER_{LLP}

787 Seventh Avenue
New York, NY 10019-6099
Tel: 212 728 8000
Fax: 212 728 8111

October 27, 2020

VIA ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Akshay Aiyer*, 1:18-CR-00333 (JGK)

Dear Judge Koeltl:

We represent Defendant Akshay Aiyer in the above-captioned action. We respectfully request that the Court permit Mr. Aiyer to file publicly a redacted version of his Reply Memorandum of Law in Support of his Motion for Bail Pending Appeal (the “Reply Memorandum”) and an unredacted version of the Reply Memorandum under seal.

Mr. Aiyer’s Reply Memorandum addresses the issue of potential juror misconduct. Consistent with the Court’s prior handling of this issue, and to ensure juror privacy, Mr. Aiyer proposes to redact all portions of the Reply Memorandum dealing with this issue.

We discussed Mr. Aiyer’s proposed redactions to the Reply Memorandum with the Government, and they do not object his request.

Accordingly, we request that the Court enter an order permitting an unredacted version of Mr. Aiyer’s Reply Memorandum to be filed under seal.

Respectfully submitted,

/s/ Martin Klotz

Martin Klotz

cc: Kevin Hart, Esq.
Eric Hoffmann, Esq.
Department of Justice, Antitrust Division (by e-mail)